



Taimur Alamgir
Talamgir@kdvlaw.com

Kaufman Dolowich & Voluck, LLP
135 Crossways Park Drive, Suite 201
Woodbury, New York 11797
Telephone: 516.681.1100
Facsimile: 516.681.1101
www.kdvlaw.com

October 28, 2020

Via ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jose Panora v. Deenora Corp., et al., E.D.N.Y. Case No. 19-CV-7267 (BMC)

Dear Judge Cogan:

We represent Defendants in the above-referenced matter. Pursuant to Your Honor's Order dated October 27, 2020, annexed hereto is a complete copy of Plaintiff's deposition transcript. We note that Exhibits 1-18 to Plaintiff's deposition transcript were not included in the interest of brevity (Exhibit 19 is a video clip). However, should Your Honor wish to review any of the deposition exhibits, please let us know and we will file/arrange delivery to the Court of same.

Lastly, Plaintiff's counsel is correct in pointing out that we failed to include pp. 109-110 of Plaintiff's deposition transcript in the excerpts thereof exhibited to our pre-motion letter at Dkt. No. 68, despite citing to those pages in our filing. This was a regrettable and inadvertent error, for which we apologize to Your Honor.

Respectfully submitted,
KAUFMAN DOLOWICH & VOLUCK, LLP



By: _____
Taimur Alamgir

cc: Plaintiff's counsel via ECF